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Attorneys for Defendants
City of Walnut Creek; Walnut Creek Police Sergeant Ryan
Hibbs; Walnut Creek Police Officer Lee Herrington; Walnut
Creek Police Officer Adams; and Walnut Creek Police Officer
Ashley Roskos

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

PAUL ALFRED SINCERNY,

Plaintiff,

vs.

City of Walnut Creek et al.,

Defendants.

Case No. C17-02616 HSG

**STIPULATION AND ORDER TO
CONTINUE THE UPCOMING CASE
MANAGEMENT CONFERENCE**

Date: May 1, 2018
Time: 2:00 p.m.
Dept: Ctrm 2-4th Flr. (Oakland)
Judge: Hon. Haywood S. Gilliam, Jr.

The PARTIES, by and through their respective attorneys of record, hereby stipulate to the following:

- WHEREAS the parties attended an Early Neutral Evaluation (ENE) in this matter on April 12, 2018.
- WHEREAS discussions between the parties following the April 12, 2018, ENE have been ongoing and the parties have now reached a tentative settlement, subject to the approval by the Walnut Creek City Council. Defendants anticipate approval of the tentative settlement within the next three weeks (likely on Tuesday, May 15th).
- WHEREAS the parties currently have a Further Case Management Conference ("CMC")

STIPULATION AND ORDER TO CONTINUE
THE UPCOMING CASE MANAGEMENT
CONFERENCE, C17-02616 HSG

1 scheduled in this matter for May 1, 2018.

- 2 4. WHEREFORE good cause has been shown to continue the Further CMC in this matter
3 out for 45 to 60 days, to provide the parties enough time for approval of the settlement by
4 the Walnut Creek City Council and to file a dismissal with prejudice in this action.

5 **IT IS SO STIPULATED.**

6 The parties attest that concurrence in the filing of these documents has been obtained from
7 each of the other Signatories, which shall serve in lieu of their signatures on the document.

8 Dated: April 24, 2018

HELBRAUN LAW FIRM

9 By: /s/ Helbraun, David M

10 David M. Helbraun, Attorney for Plaintiff
Paul Alfred Sincerny

11 Dated: April 24, 2018

12 McNAMARA, NEY, BEATTY, SLATTERY,
BORGES & AMBACHER LLP

13 By: /s/ Blechman, Noah G.

14 Noah G. Blechman
15 Attorneys for Defendants
16 City of Walnut Creek; Walnut Creek Police Sergeant
Ryan Hibbs; Walnut Creek Police Officer Lee
Herrington; Walnut Creek Police Officer Adams; and
Walnut Creek Police Officer Ashley Roskos

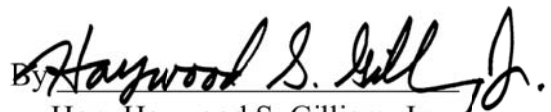
17 **ORDER**

18 PURSUANT TO THE PARTIES' STIPULATION, IT IS HEREBY ORDERED AS FOLLOWS:

19 The Further Case Management Conference in this matter currently set for May 1, 2018, is
20 hereby continued to June 19, 2018, at 2:00 p.m. in Courtroom 2, 4th Floor, Northern District
21 Court, Oakland. The parties are also ordered to file a Further Joint Case Management Conference
22 Statement one week prior to that hearing.

23 **IT IS SO ORDERED.**

24
25 Dated: April 25, 2018

26 
27 Hon. Haywood S. Gilliam, Jr.
28 U.S. District Court Judge